

# **EXHIBIT C**



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August 27, 2022

*via email to michael@stockmanporopat.com*

Michael J. Poropat  
Stockman Poropat, LLC  
371 Sunrise Highway  
Lynbrook, NY 11563

**Re: Demand for Immediate Retraction of Infringement Complaint**

Mr. Poropat:

This law firm represents Oralic Supplies Inc. (“Oralic”), a leading seller of personal care products on platforms such as Amazon.com.

Late yesterday our client received a notice from Amazon indicating that you filed an infringement report against Oralic’s ASIN B00NN07IMW (the “IMW ASIN”). The ‘IMW ASIN is a BRUSHMO-branded replacement toothbrush head. In the report, you asserted that the ‘IMW ASIN infringes your client’s U.S. Patent 11,253,052 (the “’052 patent”).

**We demand that you immediately contact Amazon and withdraw this complaint.**

The claims of your client’s patent are very specific and require many features that are not present in the ‘IMW ASIN. To provide just one of many distinctions as an example, all claims of the ‘052 patent require “an elastic bar that is elastically swingable.” This feature is not part of the ‘IMW ASIN.

A Pennsylvania Limited Liability Partnership



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Also, as the Amazon product listing page clearly shows (see below), Oralic introduced the 'IMW ASIN in September 2014:

**Product details**

Is Discontinued By Manufacturer : No  
Product Dimensions : 8.5 x 3.5 x 1 inches; 2.6 Ounces  
Item model number : 858431005084  
Date First Available : September 17, 2014  
Manufacturer : Brushmo  
ASIN : B00NN07IMW

The internal structure of the 'IMW ASIN has not changed since at least 2017. Your client filed its patent application in September 2021. The 'IMW ASIN predates your client's patent application by many years. If you do in fact believe that the claims of the '052 patent read onto the 'IMW ASIN, then the '052 patent is invalid in view of Oralic's prior art.

It is obvious that you did little, if any, pre-filing investigation of the 'IMW ASIN. If you had done so, you would have quickly identified the issues described above.

We require your reply, no later than **Monday, August 29**, in which you:

- confirm that you have withdrawn the complaint;
- send us a copy of your communication with Amazon withdrawing the complaint; and
- confirm that you and your client will refrain from such frivolous actions against Oralic and its products, and intentional interference with Oralic's business, in the future.

We anticipate your prompt reply.

Sincerely,

James M. Singer